COVER LETTER

To:Boiler Work Group Chair/Co-Chair ICCR Boiler Source Work Group

Attached is a table entitled <u>HAPs Selection and Test Methods for Natural Gas and Refinery Gas Fired Boilers.</u> The list contains the names of the 189 Hazardous Air Pollutants (HAPs) that have, based on experience, been screened for potential presence in emissions from natural gas and refinery gas fired boilers. This preliminary screening has been performed on the list by the Testing and Monitoring Protocol Work Group (TMPWG). This table is being forwarded to the Boiler Source Work Group (SWG) for review and comment.

The table includes HAPs that may be present in these emissions. Additionally, a listing of testing methods that have been used and have the potential to quantify the HAPs presence in flue gas emissions are included.

For those HAPs that are not included in the list, a codified reason for their exclusion is provided. Exclusion codes include:

- 1- Compound is not expected to be emitted from source because basic chemical or physical principles do not favor its existence in source exhaust.
- 2 Existing test data indicate that compound is not emitted in significant quantities from source.

Other exclusion codes are included as appropriate.

It should be noted that this table is in its first draft and represents the extent of the TMPWG's knowledge and experience with emissions from natural gas and refinery gas fired boilers. Please review carefully from a standpoint of those HAPs included as well as those HAPs excluded. The subgroup within the TMPWG that is responsible for the development of this table has included a preface that provides the sources of information utilized to develop the table, the rationale for exclusion codes, and the names of the TMPWG contact for the Boiler SWG.

If you have any questions concerning in the table, please contact Tom McGrath (e-mail: "eertommc@hotmail.com") the TMPWG member who is monitoring the activities of the Boiler Source Work Group or Karl Loos (e-mail: "krloos@shellus.com) the TMPWG member responsible for the development of this table.

HAP Selection and Test Methods for Natural Gas and Refinery Gas Fired Boilers

Most source testing studies have been carried out to determine criteria pollutant emissions (NOx, SO2, etc.) and not HAPs. Analysis of the natural and refinery gas fuels results in the elimination of large categories of HAP compounds such as halogen, nitrogen, sulfur, and metal containing species. Both fuels consist of light hydrocarbon compounds: natural gas is essentially pure methane, while refinery gas is composed of hydrogen and light hydrocarbon vapors, < C-6.

Combustion is a strongly oxidizing process and many compounds are not stable under these conditions. This has been confirmed by the results of extensive testing carried out in California under the sponsorship of the Western States Petroleum Association to develop a combustion device emissions database in accord with the requirements of California State Assembly Bill 2588. Results from this database have been used to select the potential HAPs to be measured for refinery and natural gas fired boilers.

References

- 1. "AB2588 Pooled Source Emissions Test Program", The Almega Corporation Project I6551, The Almega Corporation Report I6551-4
- 2. "Pooled Source Testing of Combustion Devices: Database Users Guidance Manual", Energy and Environmental Research Corporation, Irvine CA 92718

		HAPS Selection and Test Method	s for Source Category	
Source C	ategory:	Natural Gas & Refinery Fuel Gas Fired Boilers		
	CAS No.	Chemical Name	If excluded, list reason	If included, list
In list?	<u> </u>			test methods used
Х	75070	Acetaldehyde		EPA 0011, CARB 430
	60355	Acetamide	1	Method(s)?
	75058	Acetonitrile	1	Method(s)?
	98862	Acetophenone	1	Method(s)?
	53963	2-Acetylaminofluorene	1	Method(s)?
	107028	Acrolein	1	Method(s)?
	79061	Acrylamide	1	Method(s)?
	79107	Acrylic acid	1	Method(s)?
	107131	Acrylonitrile	1	Method(s)?
		Allyl chloride	1	Method(s)?
		4-Aminobiphenyl	1	Method(s)?
		Aniline	1	Method(s)?
		o-Anisidine	1	Method(s)?
		Asbestos	1	Method(s)?
X	 	Benzene	<u>-</u>	EPA 0030, 18; CARB 422
<u>``</u>	!	Benzidine	1	Method(s)?
		Benzotrichloride	1	Method(s)?
	4	Benzyl chloride	1	Method(s)?
		Biphenyl	1	Method(s)?
	4	Bis(2-ethylhexyl)phthalate (DEHP)	1	Method(s)?
		Bis(chloromethyl)ether	<u> </u>	Method(s)?
		Bromoform		· · · · · · · · · · · · · · · · · · ·
		*	1	Method(s)?
		1,3-Butadiene	2	Method(s)?
	4	Calcium cyanamide	1	Method(s)?
		Captan	1	Method(s)?
		Carbaryl	1	Method(s)?
		Carbon disulfide	1	Method(s)?
		Carbon tetrachloride	1	Method(s)?
	4	Carbonyl sulfide	1	Method(s)?
	 	Catechol	1	Method(s)?
		Chloramben	11	Method(s)?
		Chlordane	11	Method(s)?
	7782505		11	Method(s)?
	79118	Chloroacetic acid	1	Method(s)?
		2-Chloroacetophenone	1	Method(s)?
	4	Chlorobenzene	1	Method(s)?
	510156	Chlorobenzilate	1	Method(s)?
	67663	Chloroform	1	Method(s)?
	107302	Chloromethyl methyl ether	1	Method(s)?
	126998	Chloroprene	1	Method(s)?
	1319773	Cresols/Cresylic acid (isomers and mixture)	2	Method(s)?
	95487	o-Cresol	2	Method(s)?
	108394	m-Cresol	2	Method(s)?
	106445	p-Cresol	2	Method(s)?
	4	Cumene	2	Method(s)?
		2,4-D, salts and esters	1	Method(s)?
	3547044		1	Method(s)?
	 	Diazomethane	1	Method(s)?
		Dibenzofurans	1	Method(s)?

		HAPS Selection and Test Method	s for Source Category	
Source C	ategory.	Natural Gas & Refinery Fuel Gas Fired Boilers		
	CAS No.	Chemical Name	If excluded, list reason	If included, list
In list?			, , , , , , , , , , , , , , , , , , , ,	test methods used
	96128	1,2-Dibromo3-chloropropane	1	Method(s)?
	84742	Dibutylphthalate	1	Method(s)?
	106467	1,4-Dichlorobenzene(p)	1	Method(s)?
	(3,3-Dichlorobenzidene	1	Method(s)?
	111444	Dichloroethyl ether (Bis(2-chloroethyl)ether)	1	Method(s)?
		1,3-Dichloropropene	1	Method(s)?
		Dichlorvos	1	Method(s)?
	 	Diethanolamine	1	Method(s)?
	 	N,N-Diethyl aniline (N,N-Dimethylaniline)	1	Method(s)?
		Diethyl sulfate	1	Method(s)?
		3,3-Dimethoxybenzidine	1	Method(s)?
		Dimethyl aminoazobenzene	1	Method(s)?
		3,3Dimethyl benzidine	1	Method(s)?
		Dimethyl carbamoyl chloride	1	Method(s)?
••••••	 	Dimethyl formamide	1	Method(s)?
		1,1-Dimethyl hydrazine	1	Method(s)?
		Dimethyl phthalate		
		·	1	Method(s)?
		Dimethyl sulfate	1	Method(s)?
		4,6-Dinitroo-cresol, and salts	1	Method(s)?
	 	2,4-Dinitrophenol	1	Method(s)?
		2,4-Dinitrotoluene	1	Method(s)?
		1,4-Dioxane (1,4-Diethyleneoxide)	2	Method(s)?
		1,2-Diphenylhydrazine	11	Method(s)?
		Epichlorohydrin (I-Chloro-2,3-epoxypropane)	1	Method(s)?
		1,2-Epoxybutane	1	Method(s)?
		Ethyl acrylate	1	Method(s)?
X		Ethyl benzene		EPA 0030, 18; CARB 422
		Ethyl carbamate (Urethane)	1	Method(s)?
		Ethyl chloride (Chloroethane)	1	Method(s)?
	106934	Ethylene dibromide (Dibromoethane)	1	Method(s)?
	107062	Ethylene dichloride (1,2-Dichloroethane)	1	Method(s)?
	107211	Ethylene glycol	1	Method(s)?
	151564	Ethylene imine (Aziridine)	1	Method(s)?
	75218	Ethylene oxide	1	Method(s)?
	96457	Ethylene thiourea	1	Method(s)?
		Ethylidene dichloride (1,1-Dichloroethane)	1	Method(s)?
Х		Formaldehyde		EPA 0011, CARB 430
• • • • • • • • • • • • • • • • • • • •	 	Heptachlor	1	Method(s)?
	 	Hexachlorobenzene	1	Method(s)?
		Hexachlorobutadiene	1	Method(s)?
		Hexachlorocyclopentadiene	1	Method(s)?
		Hexachloroethane	1	Method(s)?
	 	Hexamethylene-1,6-diisocyanate	1	Method(s)?
	(Hexamethylphosphoramide	1	Method(s)?
	 	Hexane	1	Widalog(s):
		Hydrazine	1	Method(s)?
		Hydrochloric acid	1	Method(s)?
		Hydrogen fluoride (Hydrofluoric acid)	1	Method(s)?
		Hydrogen sulfide Hydrogen sulfide	1	Method(s)?

		HAPS Selection and Test Method	s for Source Category	
Source C	ategory:	Natural Gas & Refinery Fuel Gas Fired Boilers		
Include	CAS No.	Chemical Name	If excluded, list reason	If included, list
In list?				test methods used
	123319	Hydroquinone	1	Method(s)?
	78591	Isophorone	1	Method(s)?
	58899	Lindane (all isomers)	1	Method(s)?
	108316	Maleic anhydride	1	Method(s)?
	67561	Methanol	1	Method(s)?
	72435	Methoxychlor	1	Method(s)?
		Methyl bromide (Bromomethane)	1	Method(s)?
		Methyl chloride (Chloromethane)	1	Method(s)?
		Methyl chloroform (1,1,1-Trichloroethane)	1	Method(s)?
		Methyl ethyl ketone (2-Butanone)	2	Method(s)?
		Methyl hydrazine	1	Method(s)?
	[Methyl iodide (Iodomethane)	1	Method(s)?
		Methyl isobutyl ketone (Hexone)	1	Method(s)?
		Methyl isocyanate	1	
		Methyl methacrylate	1	Method(s)?
		<u> </u>	 	Method(s)?
		Methyl tert butyl ether	1	Method(s)?
•		4,4-Methylene bis(2-chloroaniline)	1	Method(s)?
		Methylene chloride (Dichloromethane)	1	Method(s)?
	 	Methylene diphenyl diisocyanate (MDI)	1	Method(s)?
		4,4Methylenedianiline	11	Method(s)?
X		Naphthalene		EPA 0010; CARB 429
	<u> </u>	Nitrobenzene	1	Method(s)?
		4-Nitrobiphenyl	11	Method(s)?
		4-Nitrophenol	11	Method(s)?
		2-Nitropropane	1	Method(s)?
		N-Nitroso-Nmethylurea	1	Method(s)?
	62759	N-Nitrosodimethylamine	1	Method(s)?
	59892	N-Nitrosomorpholine	1	Method(s)?
	56382	Parathion	1	Method(s)?
	82688	Pentachloronitrobenzene (Quintobenzene)	1	Method(s)?
	87865	Pentachlorophenol	1	Method(s)?
Х	108952	Phenol		EPA 0010; CARB 429(m)
	106503	p-Phenylenediamine	1	Method(s)?
	75445	Phosgene	1	Method(s)?
		Phosphine	1	Method(s)?
		Phosphorus	1	Method(s)?
••••••	 	Phthalic anhydride	1	Method(s)?
		Polychlorinated biphenyls (Aroclors)	1	Method(s)?
		1,3-Propane sultone	1	Method(s)?
		beta-Propiolactone	1	Method(s)?
		Propionaldehyde	1	Method(s)?
		Propoxur (Baygon)	1	Method(s)?
		Propylene dichloride (1,2-Dichloropropane)	1	Method(s)?
		Propylene oxide	1	Method(s)?
		1,2-Propylenimine (2-Methyl aziridine)		
			1	Method(s)?
		Quinoline	1	Method(s)?
	,	Quinone	1	Method(s)?
		Styrene Styrene oxide	1	Method(s)? Method(s)?

		HAPS Selection and Test Metho	ds for Source Category	
Source C	ategory:	Natural Gas & Refinery Fuel Gas Fired Boilers		
	CAS No.	Chemical Name	If excluded, list reason	If included, list
In list?			,	test methods used
	1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin	1	Method(s)?
	79345	1,1,2,2-Tetrachloroethane	1	Method(s)?
	127184	Tetrachloroethylene (Perchloroethylene)	1	Method(s)?
	7550450	Titanium tetrachloride	1	Method(s)?
х	108883	Toluene		EPA 0030, 18; CARB 422
	95807	2,4-Toluene diamine	1	Method(s)?
	584849	2,4-Toluene diisocyanate	1	Method(s)?
	95534	o-Toluidine	1	Method(s)?
	8001352	Toxaphene (chlorinated camphene)	1	Method(s)?
		1,2,4-Trichlorobenzene	1	Method(s)?
		1,1,2-Trichloroethane	1	Method(s)?
		Trichloroethylene	1	Method(s)?
		2,4,5-Trichlorophenol	1	Method(s)?
		2,4,6-Trichlorophenol	1	Method(s)?
		Triethylamine	1	Method(s)?
		Trifluralin	1	Method(s)?
		2,2,4-Trimethylpentane	2	Method(s)?
<u> </u>		Vinyl acetate	1	Method(s)?
		Vinyl bromide	1	Method(s)?
		Vinyl chloride	1	Method(s)?
		Vinyl choride Vinylidene chloride (1,1-Dichloroethylene)	1	Method(s)?
x		Xylenes (isomers and mixture	 	EPA 0030, 18; CARB 422
x		o-Xylenes	 	EPA 0030, 18; CARB 422
x		m-Xylenes	 	EPA 0030, 18; CARB 422
X		p-Xylenes		EPA 0030, 18; CARB 422
		Antimony Compounds	1	Method(s)?
		Arsenic Compounds (inorganic including arsine)	1	Method(s)?
		Beryllium Compounds	1	
 		Cadmium Compounds		Method(s)?
<u> </u>		Chromium Compounds Chromium Compounds	1	Method(s)? Method(s)?
			 	
 		Coke Oven Emissions	1	Method(s)?
 		Coke Oven Emissions	NA 1	Method(s)?
		Cyanide Compounds *1	1	Method(s)?
 		Glycol ethers *2	1	Method(s)?
 		Lead Compounds	1	Method(s)?
 		Manganese Compounds	1	Method(s)?
 		Mercury Compounds	1	Method(s)?
		Fine mineral fibers *3	1	Method(s)?
ļ		Nickel Compounds	1	Method(s)?
X		Polycylic Organic Matter *4		EPA 0010; CARB 429
		Radionuclides (including radon) *5	1	Method(s)?
	N/A	Selenium Compounds	1	Method(s)?